



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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May 27, 2010

VIA E-Mail

Mr. Lance McMillan
Bedford Recycling - Mitchell Collection Yard
904 Summit Lane 103
Bedford, Indiana 47421

Re: Violation Letter
Lance McMillan
EPA ID# Non-notifier
Mitchell, Lawrence County

Dear Mr. McMillan:

On April 13, 2010, a representative of the Indiana Department Environmental Management, Office of Land Quality, conducted an inspection of commercial property located at 1201 Orchard Street, Mitchell, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	<u> </u>	Compliance Evaluation Inspection (Industrial Waste)
	<u>X</u>	Complaint
Results of Inspection:	<u>X</u>	Violations were observed. See inspection report.
	<u>X</u>	Referred to Office of Air Quality- Air Compliance, Office of Water Quality - Wetlands and Storm Water Section, Indiana Secretary of State Bureau of Motor Vehicles

Within 30 days of the receipt of this letter, submit documentation of compliance with violations cited in this inspection report. Failure to respond adequately to this Violation Letter may result in a referral to IDEM's Land Enforcement Section. Please direct any response to this letter and any questions to Mr. Dorel A. Hunt at 317-234-6933. Send electronic submissions to dhunt@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Christina Halloran for

Gary Romesser, Acting Section Chief
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure
cc: Lawrence County Health Department



**AUTO SALVAGE
INSPECTION REPORT**
INDIANA DEPARTMENT OF
ENVIRONMENTAL
MANAGEMENT

Inspector's Name:	Dorel Hunt
Other's In Attendance:	Lance McMillan, General Manager
Time In:	2:50 PM
Time Out:	3:47 PM
Date of Inspection:	4/13/2010
Purpose of Inspection:	<input type="checkbox"/> CEI <input checked="" type="checkbox"/> COI <input type="checkbox"/> EFI <input type="checkbox"/> BL <input type="checkbox"/> SF <input type="checkbox"/> PC <input type="checkbox"/> Other

General Information

Facility Contact Information

1. Facility Name:

Bedford Recycling - Mitchell Collection Yard

2. Location:

Street Address: 1201 Orchard Street

S City/State: Mitchell, Indiana

S Zip Code: 47446

S County: Lawrence

Mailing Address: 904 Summit Lane

M City/State Bedford, Indiana

M Zip Code: 47421

M County: Lawrence

3. Contact Information:

Facility Contact Person: Lance McMillan

F Phone Number: 812-849-4131

F Fax Number: 812-277-3527

Facility Contact Email: lmcmillan@bedfordrecycling.com

Property Owner: Bedford Recycling, Inc.

Facility Owner: Bedford Recycling, Inc.

Owner's Phone Number: 812-275-6883

Owner's Fax Number 812-277-3527

Owner's Email: lparsons@bedfordrecycling.com

Facility Type

1. Auto Salvage Facility:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
2. Scrap Metal Processor:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR Metal collection center for Bedford Recycling, 904 Summit Lane, Bedford, Indiana
3. Towing Service:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NR
4. Other Facility Type:	

Crusher and Scrap Metal Info

1. Are vehicles and/or other equipment crushed on-site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NR
2. Does the facility own the crusher?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NR <input type="checkbox"/> NA
3. Name and address of company operating the crusher (if brought on-site):	
4. Name and address of scrap metal processors where vehicles, equipment and other parts are sent for recycling (if sent off-site):	Bedford Recycling Inc., 904 Summit Lane, Bedford, Indiana 47421

Facility Information

1. Approximate number of vehicles processed per day/month/year?	10-15
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	<input checked="" type="checkbox"/> per day <input type="checkbox"/> per month <input type="checkbox"/> per year
2. Approximate number of vehicles currently on site?	15
3. Approximate acreage of facility?	14 acres but only use 5 acres
4. Number of years the property has been utilized as an auto salvage facility?	< 1 year
5. SIC Code(s):	<input type="checkbox"/> 5015 (Motor Vehicle Parts, Used) <input checked="" type="checkbox"/> 5093 (Scrap and Waste Materials) <input type="checkbox"/> 7549 (Automotive Services, Except Repair and Carwashes) Other
6. NAICS:	<input type="checkbox"/> 423140 (Motor Vehicle Parts (Used) Merchant Wholesalers) <input checked="" type="checkbox"/> 423930 (Recyclable Material Merchant Wholesalers) <input type="checkbox"/> 488410 (Motor Vehicle Towing) Other:

Waste Streams

From Vehicles	Removed?	Quantity on-site	Disposition
1. Used Oils (differential fluid, motor oil, transmission fluid, and brake fluid):	<input type="checkbox"/>	About 40 gal	Vehicles sent to home yard in Bedford for oil and fluids removal. On site vehicles and equipment used oil will be sent to Bedford Recycling in Bedford or will be picked up by contractor. None has been sent off site.
2. Fuel (Gas and Diesel):	<input checked="" type="checkbox"/>	None	If good, used in on site vehicles.
3. Fuel Filters:	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford
4. Lead Parts:	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford
5. Mercury (lights, hoods, and switches):	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
6. Used Oil Filters:	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
7. Antifreeze:	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
8. Batteries (Lead-Acid):	<input checked="" type="checkbox"/>	Est. 30	Sent to Bedford Recycling, Bedford.
9. Airbags (Sodium Azide):	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
10. Windshield Washer Fluid:	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
11. Brake Shoes and Clutches (Asbestos):	<input type="checkbox"/>	None	Vehicles sent to Bedford Recycling, Bedford.
12. Engines:	<input type="checkbox"/>	None	Single engines are sent to Bedford Recycling, Bedford.
13. Waste Tires:	<input type="checkbox"/>	None	Do not accept.

Non-vehicle Waste Streams

Non-vehicle Waste Streams	Quantity on-site	Disposition
1. PCB Capacitors:	None	
2. Solvents:	None	
3. Contaminated Soil:	None	
4. Paint:	None	
5. Absorbent Materials:	1 pallet	Swept up and put in roll off box for disposal at Lawrence County Landfill.

6. Shop Towels:	Est. 20	Rags. When used placed in roll off box for disposal at the Lawrence County Landfill.
7. Solid Waste (contained):	30 Cu. Yd.	Placed in roll off box and sent to the Lawrence County Landfill.
8. Solid Waste (open dump -not contained):	None.	
9. White Goods:	Est 15-29 units	Sent to Bedford Recycling, Bedford for processing.
10. Others (specify):	Several 1000 rounds of decommissioned ammunition from Crane Naval Warfare Center.	Sent to Bedford Recycling, Bedford for processing.

Checklist

BMV

1. Does the facility have a valid Salvage Motor Vehicle Business License?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
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Fluids Management

1. Is there evidence of spills or releases of fluids including gasoline, fuel, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents and paint?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
1a. Were the spills and releases reported to IDEM upon discovery?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NR		
B1. Are fluids and filters removed from vehicles prior to storing them in the yard?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2. Are fluids from vehicles removed over a cement pad, inside a building, using funnels, pumps, and/or drip pans?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B3. Are vehicle batteries removed prior to storing vehicles in the yard?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B4. Are vehicle batteries stored in a building or away from the elements, such as rain or snow, to prevent a release to the environment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B5. Is the crusher located in an impervious secondary containment unit or inside a building?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> NR
B6. Is windshield wiper fluid removed and recycled?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B7. Are containers storing fluids inspected weekly for rust, dents, holes, bulges, and leaks?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B8. Do all containers of fluids, not just those subject to the used oil or hazardous waste rules, have secure (sealed tight) lids?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B9. Are all containers of fluids, not just those subject to the used oil or hazardous waste regulations, labeled to identify their contents?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B10. Are containers stored in a building or away from the elements such as rain and snow to prevent the deterioration of the containers and a release to the environment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B11. Are empty drums stored in a manner to prevent the accumulation of rain water?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B12. Are engines, transmissions, and other vehicle parts stored in a building or away from the elements, such as rain and snow, to prevent releases to the environment?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B13. Are floor drains closed or filled in where fluids are present?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

Oil

1. Are containers and/or tanks storing used oil in good condition (free from rust, dents, holes, bulges, and leaks)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Are tanks and containers that are used to store used oil clearly labeled with the words "Used Oil"?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

3. Does the facility burn used oil in a space heater?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3a. Is the used oil that the facility burns generated only at that facility location or by a household do-it-yourselfer?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NR		
4. Is a registered transporter used for shipments of used oil?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4a. Is 55 gallons or less of used oil transported in your own vehicles (company or employee) to either a government approved collection center or an aggregation point (owned or operated by your company)? OR Is used oil being transported and reclaimed under a contract that requires your used oil to be returned to you for re-use?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NR		
5. Is the total storage capacity of on-site oil greater than 1320 gallons? Note that: -This storage capacity adds ONLY containers and/or tanks with a capacity of 55 gallons or more (i.e. small containers such as 5 gallon buckets are not added) -The total may include more than one storage location (which may need to be entered into additional information table). -"Oil" includes product oil as well as waste oil.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5a. Does the facility have an SPCC Plan (Spill Prevention, Control, and Countermeasure Plan)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NR		

Underground Storage Tanks

1. Are there any underground storage tanks (USTs) located on-site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
1a. Are there petroleum or hazardous substance containing USTs (greater than 100 gal) on-site that have not been registered with IDEM? (Underground tanks storing fuel for heating are exempt.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NR		

Hazardous Waste Management

1. Do you have any unknown material located on-site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Do you generate hazardous waste in quantities greater than or equal to 220 lbs/month?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

Waste Tire Management

1. IC 13-11-2-250 "Waste tire", for purposes of IC 13-20-13 and IC 13-20-14, means a tire that is not suitable for the tire's original purpose. Does the facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
1a. Does the facility have a valid certificate of registration as a waste tire storage facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No			
See attached Waste Tire Inspection Report	<input type="checkbox"/> Yes	<input type="checkbox"/> NA			
2. Is there evidence of open dumping of waste tires on site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3. Are waste tires stored in a manner that poses a fire hazard (including: near a heat source, welding, torching, smoking, or under electrical power-lines)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Is water prevented from accumulating in waste tires?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Do the waste tires harbor vectors (mosquitoes, rodents, fleas, ticks) that pose a threat to human health?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Does this facility ship whole waste tires off-site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6a. Are they delivered to one or more of the following approved locations? -a wholesaler or agent of a wholesaler -a manufacturer of tires -a facility that recycles or collects tires for delivery to a facility that recycles -a permitted final disposal facility regulated under environmental management laws -a permitted waste tire storage site -a facility operated as a waste tire cutting facility under a permit issued by the commissioner -a registered waste tire transporter or a person who operates a municipal waste collection and transportation vehicle	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NR		

licensed under IC 13-20-4.					
Mercury Switches					
1. Does your facility receive vehicles that contain mercury switches?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility remove mercury containing switches from vehicles?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3. Are all mercury switches and/or mercury containing ABS switches stored in a container that complies with the universal waste regulations for transportation (i.e., End of Life Vehicle Solutions [ELVS] or other Dept. of Transportation [DOT] approved) container?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Are containers in good condition and kept closed unless adding or removing mercury containing devices?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Are the containers marked as universal waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Have any containers of mercury switches been accumulating on-site for more than 1 year (containers should be labeled with accumulation start date)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Are records of mercury switch removals maintained at the facility documenting the number of cars processed at the facility, the number of vehicles that contained switches, and the total number of switches collected? (See Compliance Manual for further requirements)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
8. Does the facility have appropriate safety procedures and emergency equipment where handling mercury devices (i.e., well ventilated area, containment devices, mercury spill kit)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
9. Have employees been trained on appropriate safety and emergency procedures for removing and handling mercury switches including removing over a containment device, having a mercury spill kit on hand, and removing in a well ventilated area?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Solid Waste Management					
1. Is there evidence of open dumping of garbage, refuse, construction debris, commercial waste, industrial waste, ash piles, contaminated soils, household waste, or other similar items?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1. Does the facility remove brake or clutch pads from vehicles?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1a. Are measures taken to eliminate asbestos exposure?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2. Does this facility remove air bags?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2a. Are measures taken to safely remove un-deployed airbags?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Air					
1. Is there any evidence of open burning (Note: No burning is permitted except in an approved device)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Are solvents (cleaners/degreasers) used at this facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2a. Are degreaser (parts washer) covers closed when not cleaning parts?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2b. Are waste solvent containers stored closed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NA		
3. Is there any activity generating dust or spray that crosses property lines?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Is there a sweat furnace (i.e., a furnace used to reclaim aluminum from scrap metal) in use at the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Are there records documenting appropriate removal of refrigerants from vehicles, white goods, or other equipment? (Referred to Compliance Manual Tab 6, Pg. 4)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

6. Are refrigerants collected in EPA approved devices? (Referred to Compliance Manual Tab 2, Pg. 2)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Are refrigerants (i.e., Freon, CFCs, etc.) being discharged to the atmosphere?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1. Are refrigerants removed from vehicles prior to storing them in the yard?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2. Are employees trained to remove and capture refrigerants?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B3. Are all AC openings sealed after evacuation to prevent leaking of residual refrigerant?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B4. Are collection/storage devices inspected to ensure they are not overfilled?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Water					
1. Are there any existing or planned land disturbing activities that exceed one acre at the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3. Is there extensive soil buildup on roads around the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Does the facility have any construction or filling activities in a potential floodway?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Is the facility (or any part) located within a potential designated wetland area?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Is the facility's drinking water supplied by a municipal system (private or public)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6a. Does the facility have a PWS ID Number?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Has the facility submitted a Notice of Intent (NOI) for Storm Water Rule 6?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7a. Does the NOI accurately reflect the storm water conditions (i.e. location of outfalls and drainage areas) at the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
8. Has the facility submitted a Storm Water Pollution Prevention Plan (SWP3) Certification Checklist signed by a qualified professional (i.e., trained and experienced in storm water treatment techniques) to the Department? (See Compliance Manual for further details)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
9. Has the facility developed a Storm Water Pollution Prevention Plan (SWP3)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
10. Has the facility implemented good housekeeping measures described within the SWP3 at the site to ensure that contaminants from auto salvage activities aren't exposed to storm water?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
11. Does the facility document quarterly inspections of storm water run-off conveyances looking for oil sheens, discoloration, dead aquatic life, and sediment buildup in nearby ditches and/or streams?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
12. Has the facility documented annual employee training on the components and goals of the SWP3? (i.e. spill response, good housekeeping, and materials management)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13. Has the facility submitted storm water sample results of the required twelve (12) parameters?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13a. Do sample results indicate any contamination of the twelve (12) parameters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13b. Did the facility identify the source of the contaminate(s) and eliminate them?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Miscellaneous					

1. Were any potential workplace safety issues observed pertaining to IOSHA (e.g., loading and moving vehicles in an unsafe manner, stacking cars, waste, or parts too high, or not wearing respiratory, eye or other protection when needed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility have permanent or handheld radiation equipment on-site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

Summary

Staff met with the on site manager of Bedford Recycling- Mitchell Collection Center, Lance McMillan. Staff explained that the inspection was being conducted due to a complaint that oil was oil running off the property and draining into an adjacent residential area. No confirmation of spilled or migrating oil off site was observed during this inspection.

Mr. McMillan stated that Bedford Recycling had purchased the closed fourteen (14) acre Dana Products facility. The facility opened on March 23, 2009 using the west end portion of the property for a collection yard for metals being brought in by the public. The only activity that takes place at the facility is sorting of metals purchased by type and subsequently loading those materials into trucks for transit to the processing facility at 904 Summit Lane in Bedford. The Bedford facility does the required preparation for shredding or for shipment.

Mr. McMillan stated the facility does not have a Salvage Motor Vehicle Business License. He estimated that on average ten (10) to fifteen (15) vehicles are purchased per day. Vehicles purchased include cars, light trucks, small trailers, buses and intermediate trucks. Prior to purchase the customers sign a statement that the refrigerants have been removed. He also noted that a similar statement is also signed as customers drop off all refrigeration equipment. The only item that is removed from vehicles purchased is their battery. The batteries are stored inside a small storage area inside the support building. All other vehicle removal activities are completed at the processing facility.

Staff and Mr. McMillan took a walkabout the facility. The collection yard is located on a rounded slope which trends down slope to the northwest corner of the manufacturing building. A surface discharge pile leads to a drainage ditch which runs parallel to the north side of the warehouse. Mr. McMillan stated that if heavy rains occur, water then flows around and into the loading dock which has a sump that also discharges into the same ditch. Sediments were noted covering the concrete pad of the loading dock.

The west end of the manufacturing building is being used for light maintenance of onsite equipment and storage of decommissioned ammunition shells from Crane Navel Weapons Depot. A two hundred fifty (250) gallon wire wrapped poly tote contained about forty (40) gallons of used oil. The tote was not labeled with the words "Used Oil". Staff provided a sticker with the words "Used Oil" which was attached to the side of the tote. It has not been determined if the used oil will be sent to Bedford Recycling in Bedford and consolidated there or if a used oil transporter will pick it up. According to 329 IAC 13-4-5(2): Generators may transport, without an EPA identification number, used oil that is generated at the generator's site to an aggregation point provided that : (A) the generator transports the used oil in a vehicle owned by the generator or owned by an employee of the generator; (B) the generator transports no more than fifty-five (55) gallons of used oil at any time; (C) the generator transports the used oil to an aggregation point that is owned or operated by the same generator.

No solid waste or waste tires were observed at the facility.

The facility has ingress/egress point on Orchard Street. Customers follow a gravel lane that makes a large loop. Customers are then brought to the scale, then to off loading finally to drive out of the facility. Staff observed noticeable dust caused by customer vehicles coming through the facility which was also aggravated by wind. The dust was blowing off site to the south east. Mr. McMillan stated that they do not use any dust suppressants.

Mr. McMillan did not know if the facility had a storm water plan. Staff subsequently contacted Megan Nagle, Storm Water Specialist who advised that her records indicated that no Notice of Intent (NOI) has been received from Bedford Recycling- Mitchell.

Description of Violations and Further Actions

BMV

1. *Note: The facility does not have a Salvage Motor Vehicles Business License.*

Required Action: Immediately contact the BMV to obtain/renew your facility Salvage Motor Vehicle Business License. Within (30) days of receipt of the Violation Letter, please submit documentation of your valid license.

Referral: Referred to the Bureau of Motor Vehicles

Fluids Management

B12. *Note: No engines or transmissions are pulled from vehicles that come in. Occasionally an engine is brought in separate from its vehicle. Those engines are placed in the vehicle pile and are moved to Bedford Recycling, Bedford.*

BMP Recommended Action: Store engines, transmissions, and other vehicle parts in a building or under cover away from rain and snow to prevent releases to the environment.

Oil

2. 329 IAC 13-4-3(d)(1): Used oil storage Sec. 3. (d) Requirements for labels shall be as follows: (1) Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".

Note: The two hundred fifty (250) gallon wire wrapped poly tote that is used to store used oil was not labeled. A "Used Oil" sticker was provided to Mr. McMillan who affixed to the side of the tote.

Required Action: Label (e.g., via stickers, paint, marker, stenciling) all tanks and containers with the words "Used Oil". Submit to IDEM documentation of labeling (e.g., photographs).

Status: In Compliance.

Mercury Switches

2. IC 13-20-17.7-5 (a): Motor vehicle recyclers required to remove mercury switches; procedures and further requirements Sec. 5. (a) Beginning thirty (30) days after the earliest date the commissioner approves a plan under section 4 of this chapter, a motor vehicle recycler is required to remove all mercury switches from each end of life vehicle the motor vehicle recycler receives upon receipt of the vehicle.

Note: No removal of switches takes place at the Mitchell Collection site. Switches are removed at the processing yard in Bedford.

Required Action: Maintain documentation on site indicating that Bedford Recycling in Bedford is removing the mercury switches. In addition, Bedford Recycling must handle the waste appropriately; submit documentation that they are disposing/recycling these switches appropriately (e.g. proof of participation in the ELVS Program).

Air

3. 326 IAC 6-4-2(4): Emission limitations Sec. 2. A source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated: (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section.

Dust Source	Color	Duration	Time of Day	Weather	Wind Direction	Constant v. Intermittent	Location
Customer vehicles driving over the gravel loop road through facility.	white/tan	Each vehicle est. 1 to 3 minutes.	Viewed during inspection.	Clear, slight breeze.	south west	no dust suppressant.	

Note: Duration above is estimated time each customer vehicle is in motion, not total time on site. Customers drive in, stop, go, stop, go while waiting in line to be checked in, conduct off loading and departure.

Referral: Referred to the Office of Air Quality - Air Compliance Section.

Water

7. 327 IAC 15-6-5; 327 IAC 15-6-6; 327 IAC 15-6-6; 327 IAC 15-6-7: Facilities subject to general storm water permit

requirements must submit an NOI letter with all required information, and comply with all subsequent storm water permit requirements including developing a SWP3, submitting a SWP3 checklist, conducting quarterly inspections, documenting employee annual training, sampling storm water, submitting annual reports, identifying and eliminating storm water contaminants.

Note: Mr. McMillan was unaware of Rule 6 Storm Water requirements. He advised that this would be overseen by the staff at the facility in Bedford.

Required Action: Within thirty (30) days of receipt of this report, submit your storm water Notice of Intent (NOI). In addition to submitting the NOI, submit the pollution prevention checklist, develop and implement the SWPPP, and conduct annual sampling in accordance with the required timelines.

Compliance with the NOI requirements and required follow up submittals and testing may be monitored through the Office of Water Quality, Wetlands and Storm Water Section. The contact person who can assist you is Ms. Megan Nagle, at 317-234-5029.

Referral: Referred to the Office of Water Quality -Wetlands and Storm Water Section



Facility Name

Bedford Recycling- Mitchell Yard

Photographer

Dorel Hunt

Date

April 13, 2010

Others Present

Lance McMillan – Yard Manager

Description

Vehicle storage area at west end of yard.



Facility Name

Bedford Recycling- Mitchell Yard

Photographer

Dorel Hunt

Date

April 13, 2010

Others Present

Lance McMillan – Yard Manager

Description

Main lane looking east.



Facility Name

Bedford Recycling- Mitchell Yard

Photographer

Dorel Hunt

Date

April 13, 2010

Others Present

Lance McMillan – Yard Manager

Description

West end of yard. truck, trailer and bus storage.



Facility Name

Bedford Recycling- Mitchell Yard

Photographer

Dorel Hunt

Date

April 13, 2010

Others Present

Lance McMillan -- Yard Manager

Description

Inside main building. "Used Oil" tote.
Label provided by staff affixed during inspection.



Facility Name

Bedford Recycling- Mitchell Yard

Photographer

Dorel Hunt

Date

April 13, 2010

Others Present

Lance McMillan -- Yard Manager

Description

Battery storage inside operations building.



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on April 13 2010 an inspection of Bedford Recycling Collection was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

☒ Auto Sewage Complaint
☐
☐

☐ Complaint
☐ Multi-Media Screening Evaluation
☐ Other

Preliminary Inspection/Screening Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- ☐ No violations were discovered with respect to the particular items observed during the inspection.
☒ Violations were discovered but corrected during the inspection.
☒ Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
☐ Violations were discovered and may subject you to an appropriate enforcement response.
☐ Additional information/review is required to evaluate overall compliance.
☐ Other / Comments (attachment may be included)

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- ☒ Multi-media screening not conducted.
☐ No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
☐ Potential violations were discovered but corrected during the inspection.
☐ Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ☐ Yes ☒ No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Dorel A. Hunt	<i>[Signature]</i>	317-234-6233	4/13/10	In: 2:30 P Out: 3:47 P

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Lance K. McMillan	<i>[Signature]</i>	Manager	(812) 849-4131	4/13/10

DISTRIBUTION: White - IDEM Public File; Canary - Office of Pollution Prevention and Technical Assistance (if OPPTA assistance is requested) or IDEM Representative (i.e., inspector) (if OPPTA assistance is not requested); Pink - Owner/Agent Representative

**Bedford Recycling, Inc.**

904 Summit Lane

Bedford, IN 47421

Phone: 812-275-6883

Fax: 812-277-3527

AGREEMENT BETWEEN BEDFORD RECYCLING AND SUPPLIER

This agreement is made and agreed to between Bedford Recycling, Inc. (referred to herein as "Bedford Recycling") and the undersigned Supplier ("Supplier")

WHEREAS, Supplier desires to sell and Bedford Recycling desires to acquire certain materials pursuant to the terms and conditions identified herein.

NOW THEREFORE, the parties agree as follows:

1. Supplier may deliver to Bedford Recycling motor vehicles, appliances and other recyclable metal materials which may contain CFC's or other refrigerants. Bedford Recycling shall have the right, but not the obligation, to purchase these materials. Bedford recycling shall also have the right to refuse any material which does not confirm to the terms of this Agreement or any other standards that may apply to such material.
2. Supplier agrees to comply with all applicable regulations, including the Federal Clean Air Act, relating to the removal of CFC's and other refrigerants from motor vehicle air conditioners and appliances by:
 - a. Removing CFC's or other refrigerants prior to delivery to Bedford Recycling, in which case supplier certifies that it is responsible for recovering all refrigerants in accordance with any applicable regulations.
3. Supplier also agrees to remove all PCB capacitors from scrap materials prior to delivery to Bedford Recycling.

Bedford Recycling, Inc.

Supplier

By: _____

Supplier Name: _____

Date: _____

Signature: _____

Address: _____

Date: _____

Lewis, Mary

From: Lance McMillan [lmcmillan@bedfordrecycling.com]
Sent: Friday, May 28, 2010 5:44 AM
To: Lewis, Mary
Subject: Received Inspection Report for Bedford Recycling, Mitchell Indiana

I have received the inspection report.

Sincerely,

Lance McMillan
Manager
Bedford Recycling, Inc. Mitchell Collection Site